

Page 1 of 9

BAQ Engineering Services Division

Company Name:Transcontinental Gas Pipeline Company, LLCPermit Writer:Utpal B. PatelPermit Number:TV-2060-0179Date:DRAFT

EXPEDITED REVIEW:

DATE APPLICATION RECEIVED: March 27, 2015

No

DATE OF OCRM APPROVAL: N/A

FACILITY DESCRIPTION: This facility is a natural gas compressor station. The primary operation of the facility is the compression and transmission of natural gas. The other operations at Station 140 are the removal and storage of entrained liquids and maintenance blowdown operations.

PROJECT DESCRIPTION: The facility is applying for a Title V renewal.

COLLOCATION DETERMINATION: The facility is not co-located with any other facility.

CHANGES SINCE LAST OP ISSUANCE

- (1) AA Corrected Unit ID numbers: Part 5.A, Part 5.C.01a, 01b, 01c, Part 5.C.02a, 02b, 02c, Part 5.C.03a, 03b, 03c, Part 5.C.04a, 04b, 04c, Part 5.C.05a, 05b, 05c, Part 5.C.06a, 06b, 06c, and Part 5.C.07a, 07b, 07c. Part 5.C.06c corrected Condition Numbers, as Condition 06.2 was previously listed twice on successive Conditions. Conditions are now listed as Condition Number 10.1 thru 10.4. Condition 5.D.1 Corrected Unit ID numbers.
- (2) MM Incorporate Construction Permit 2060-0179-CE into Title V Operating Permit. Modified PART 5.C.05 Tables a & b Unit ID 09 to reflect modifications to Equipment ID-MU-14 and added Control Device CD-OxCAT-14. PART 5.C.05c CONDITIONS FOR EMISSION UNIT ID 09- modified condition 09.1 and added conditions 09.3 & 09.4. Added Part 7, NESHAP Requirements. Updated Attachment A.
- (3) MM Voided out Unit 11. Reclassified Equip. ID 16 to emergency status and moved to Insignificant Activities as IA-024. Voided out Equip. ID 20. Reserved Part 5.C.07a, Part 5.C.07b, and Part 5.C.07c.

SOURCE TEST REQUIREMENTS:

MU-1-MU-13 - Source test for NOx emissions, one engine per Unit ID per Control Period. NOx emissions and testing requirements are established by the NOx SIP Call Phase II.

MU-14 - Compliance and Performance Testing will be required per 40 CFR 60, subpart JJJJ and 40 CFR 63, subpart ZZZZ.

SPECIAL CONDITIONS, MONITORING, LIMITS:

MU-1-MU-13 - NOx limits and monitoring for this facility are established by the NOx SIP Call Phase II.

EMISSIONS

UNCONTROLLED POTENTIAL EMISSIONS					
Equip ID	Pollutant	lb/hr	TPY	Method for Estimating Emissions	
MU-1	NOx	25.60***	112.13	See comments *** below	
Thru	CO	5.40	23.65	Manufacturing Data	
MU-6	VOC	3.30	14.45	Manufacturing Data	
(each)	PM/PM ₁₀ /PM _{2.5}	0.77	3.36	AP 42 Fifth Edition, Table 3.2-1	
	SO_2	0.01	0.052	AP 42 Fifth Edition, Table 3.2-1	
	CO ₂ /CO _{2e}	2352.94/2482	10306/10871	40 CFR 98, Subpart C, Table A-1, Table C-1 and Table C-2	
	Formaldehyde	1.10	4.84	AP 42 Fifth Edition, Table 3.2-1	
	Acetaldehyde	0.16	0.68	AP 42 Fifth Edition, Table 3.2-1	
	Acrolein	0.16	0.68	AP 42 Fifth Edition, Table 3.2-1	
MU-7	NOx	26.9***	117.82	See comments *** below	
Thru	CO	5.70	24.97	Manufacturing Data	
MU- 9	VOC	3.50	15.33	Manufacturing Data	
(each)	PM/PM ₁₀ /PM _{2.5}	0.81	3.53	AP 42 Fifth Edition, Table 3.2-1	
	SO_2	0.01	0.054	AP 42 Fifth Edition, Table 3.2-1	



Page 2 of 9

BAQ Engineering Services Division

Transcontinental Gas Pipeline Company, LLC TV-2060-0179 Permit Writer: Date: Utpal B. Patel DRAFT Company Name: Permit Number:

	UNCONTROLLED POTENTIAL EMISSIONS				
Equip ID	Pollutant	lb/hr	TPY	Method for Estimating Emissions	
	CO ₂ /CO _{2e}	2470.59/2606	10821/11414	40 CFR 98, Subpart C, Table A-1, Table C-1 and Table C-2	
	Formaldehyde	1.16	5.08	AP 42 Fifth Edition, Table 3.2-1	
	Acetaldehyde	0.16	0.71	AP 42 Fifth Edition, Table 3.2-1	
	Acrolein	0.16	0.72	AP 42 Fifth Edition, Table 3.2-1	
MU-10	NOx	34.90***	152.86	See comments *** below	
and	CO	7.30	31.97	Manufacturing Data	
MU-11	VOC	4.50	19.71	Manufacturing Data	
(each)	PM/PM ₁₀ /PM _{2.5}	1.04	4.57	AP 42 Fifth Edition, Table 3.2-1	
	SO_2	0.02	0.07	AP 42 Fifth Edition, Table 3.2-1	
	CO ₂ /CO _{2e}	3200/3375	14016/14782	40 CFR 98, Subpart C, Table A-1, Table C-1 and Table C-2	
	Formaldehyde	1.50	6.58	AP 42 Fifth Edition, Table 3.2-1	
	Acetaldehyde	0.21	0.92	AP 42 Fifth Edition, Table 3.2-1	
	Acrolein	0.21	0.93	AP 42 Fifth Edition, Table 3.2-1	
MU-12	NOx	34.90***	152.86	See comments *** below	
and	CO	7.30	31.97	Manufacturing Data	
MU-13	VOC	4.50	19.71	Manufacturing Data	
(each)	PM/PM ₁₀ /PM _{2.5}	1.04	4.57	AP 42 Fifth Edition, Table 3.2-1	
	SO_2	0.02	0.07	AP 42 Fifth Edition, Table 3.2-1	
	CO ₂ /CO _{2e}	3200/3375	14016/14782	40 CFR 98, Subpart C, Table A-1, Table C-1 and Table C-2	
	Formaldehyde	1.50	6.58	AP 42 Fifth Edition, Table 3.2-1	
	Acetaldehyde	0.21	0.92	AP 42 Fifth Edition, Table 3.2-1	
	Acrolein	0.21	0.93	AP 42 Fifth Edition, Table 3.2-1	
MU-14	PM/PM ₁₀ /PM _{2.5}	3.6	15.7	AP 42, Section 3.2, Table 3.2-1	
	NOx	20.4	89.5	Stack Tests conducted in June/July 2006	
	CO	40.89	179.1	Stack Tests conducted in June/July 2006	
	SO_2	0.21	0.9	AP 42, Section 3.2, Table 3.2-1	
	VOC	14.32	62.7	Stack Tests conducted in June/July 2006	
	CO ₂ /CO _{2e}	8729.41/9207	38234/40326	40 CFR 98, Subpart C, Table A-1, Table C-1 and Table C-2	
	Formaldehyde	4.09	17.9	AP 42, Section 3.2, Table 3.2-1	
	Total HAPs	5.57	24.4	AP 42, Section 3.2, Table 3.2-1	
MU-15	NOx	20.70	90.67	Manufacturing Data	
	CO	14.99	65.66	Manufacturing Data	
	VOC	3.72	16.29	Manufacturing Data	
	PM/PM ₁₀ /PM _{2.5}	0.23	1.00	AP 42 Fifth Edition, Table 3.2-1	
	SO_2	0.36	1.58	AP 42 Fifth Edition, Table 3.2-1	
	CO ₂ /CO _{2e}	13200/13311	57816/58302	40 CFR 98, Subpart C, Table A-1, Table C-1 and Table C-2	
	Formaldehyde	0.09	0.37	AP 42 Fifth Edition, Table 3.2-1	
	Acetaldehyde	0.005	0.02	AP 42 Fifth Edition, Table 3.2-1	
	Acrolein	0.001	0.003	AP 42 Fifth Edition, Table 3.2-1	

CONTROLLED POTENTIAL EMISSIONS				
ID	Pollutant	lb/hr	TPY	Method for Estimating Emissions



STATEMENT OF BASIS Page 3 of 9

BAQ Engineering Services Division

Company Name:Transcontinental Gas Pipeline Company, LLCPermit Writer:Utpal B. PatelPermit Number:TV-2060-0179Date:DRAFT

	CONTROLLED POTENTIAL EMISSIONS				
ID	Pollutant	lb/hr	TPY	Method for Estimating Emissions	
MU 1 – 6 (each)	NOx	25.60***	112.13	See comments *** below	
MU 7 – 9 (each)	NOx	26.9***	117.82	See comments *** below	
MU 10 – 11 (each)	NOx	34.90***	152.86	See comments *** below	
MU 12 – 13 (each)	NOx	34.90***	152.86	See comments *** below	
MU-14	CO	17.2	75.2	Stack Tests**	
	VOC	7.2	31.3	Stack Tests**	
	Formaldehyde	1.7	7.5	AP 42, Section 3.2, Table 3.2-1*	
	Total HAPs	2.8	12.2	AP 42, Section 3.2, Table 3.2-1*	

^{*}Calculation includes the HAP reductions by the oxidation catalyst.

The projected emission reductions achievable by the catalyst over the normal range and duration of operation are 58% for CO and formaldehyde and 50% for VOC and Total HAPs.

*** Construction Permit CD resulted in the modification of Compressors MU-1 through MU-13. These modifications were permanent in nature and provide the same NOx reduction year-round. Controlled NOx emissions were originally calculated for the NOx "Control Period", May 1 through September 30 only. The facility had originally requested that the Controlled NOx emission levels be applied only to the Control period. In order to show compliance in Modeling for NOx, the facility later requested that the Controlled emission level be applied for the entire year. Since the NOx Controlled emission level is a federally enforceable limit, it will apply as both the Uncontrolled and Controlled emission rate.

FACILITY WIDE EMISSIONS				
Pollutant	Uncontrolled Emissions	Controlled Emissions		
Fonutant	TPY	TPY		
NOx	1823.76*	1823.76*		
CO	550.0	495.4		
VOC	291.95	260.55		
PM/PM ₁₀ /PM _{2.5}	66.18	N/A		
SO_2	3.28	N/A		
$\mathrm{CO_2/CO_{2e}}$	246413/257224	N/A		
Formaldehyde	107.0	89.10		
Acetaldehyde	11.57	11.57		
Acrolein	11.60	11.60		
Total HAPs	137.0	114.10		

^{*} The three Auxiliary Generators, AUX-1 (IA-021), AUX-2 (IA-022) and AUX-3 (IA-023) are limited to 500 hours/yr.

OPERATING PERMIT STATUS: The facility is a Title V Source and has applied for TV renewal.

REGULATORY APPLICABILITY REVIEW

Regulation	Comments/Periodic Monitoring Requirements
Section II.E - Synthetic Minor	The facility is a major source for PSD, with potential emissions of NOx, CO, and VOC greater than 250 TPY. The facility does not have any synthetic minor limit. (See comments under Standard 7.)
Standard No. 1	All reciprocating internal combustion engines and turbines at this facility are direct fired.
Standard No. 3 (state only)	No waste combustion and reduction process.
Standard No. 4	Unit I.D. 5 - Engines 1-6 will be subject to opacity limit of 40% each

^{**} Stack Tests conducted in June/July 2006



STATEMENT OF BASIS Page 4 of 9

BAQ Engineering Services Division

Company Name:Transcontinental Gas Pipeline Company, LLCPermit Writer:Utpal B. PatelPermit Number:TV-2060-0179Date:DRAFT

Regulation	Comments/Periodic Monitoring Requirements
	Unit I.Ds. 6-8,10 - Engines 7-13 and turbine will be subject to opacity limit of 20% each
	Unit I.D. 9 - The reconstructed MU-14 has an opacity limit (including any fugitives) of 20%.
	Std 4, PM limits will not apply because Process weight rate by definition does not include gaseous fuels, whereas in these engines gaseous fuel is the only material introduced to the process.
Standard No. 5	This facility is not included in the processes described in SC Regulation 61-62.5 Standard 5 SECTION II and is not subject to this regulation.
	MU-14 - The reconstructed 74.2 million BTU/hr, 9,280 HP Lean Burn, Internal combustion engine will fall under the requirements of Table 1:
	Internal Combustion Engines Spark Ignition, Lean Burn Technology or equivalent technology capable of Achieving 1.0 gm/bhp-hr.
	The facility has supplied a manufacturer certification.
	MU-1 through MU-13 and MU-15 and three Auxiliary Generators, AUX-1, AUX-2, and AUX-3 are existing units (Installed prior to June 25, 2004) and as per e-mail dated October 5, 2015 from Cecilia Chapa – These Reciprocating Internal Combustion engines do not have burner assembly; therefore, these existing units are not subject to this regulation (Section I – Applicability(A)(2)).
Standard No. 5.2	The operation of Reciprocating Internal Combustion engine (that does not have burner assembly) that drives the compressors at Pipeline facilities are explained below:
	As per AP-42, Section 3.2.2 - In a 2-stroke engine, the air-to-fuel charge is injected with the piston near the bottom of the power stroke. The intake ports are then covered or closed, and the piston moves to the top of the cylinder, compressing the charge. Following ignition and combustion, the power stroke starts with the downward movement of the piston. As the piston reaches the bottom of the power stroke, exhaust ports or valves are opened to exhaust, or scavenge, the combustion products, and a new air-to-fuel charge is injected.
	These large piston engines resemble automobile engines, only much larger. Commonly known as "recips," these engines are fueled by natural gas from the pipeline. Reciprocating pistons, located in cylinder cases on the side of the unit, compress the natural gas. The compressor pistons and the power pistons are connected to a common crankshaft.
	The facility is a major source for PSD, with potential emissions of NOx, CO, and VOC greater than 250 TPY. Any future project that results in a significant net emissions increase will trigger PSD applicability.
	Construction Permit CD did not trigger PSD because at that time it was considered a Pollution Control Project (PCP), as it was deemed "environmentally beneficial".
Standard No. 7	Construction permit CE - This modification is not significant as a result of emission increases. Please see table below labeled PSD Table. Without the control device both CO and VOC would
	have triggered PSD. The controlled or after-catalyst potential emissions can be considered for PSD determination, as the catalyst is federally enforceable. It is considered to be federally enforceable because it is required by 40 CFR 63, subpart ZZZZ, a federal regulation. As a result
	of the federally enforceable requirement for the control device, Tons/Year limits for CO and VOC are not required to be included in the permit for PSD avoidance.
61-62.6	This facility does not have fugitive PM (dust) emissions.



Page 5 of 9

BAQ Engineering Services Division

Company Name:Transcontinental Gas Pipeline Company, LLCPermit Writer:Utpal B. PatelPermit Number:TV-2060-0179Date:DRAFT

Subpart GG—Standards Of Performance For Stationary Gas Turbines: This subpart will apply to MU-15. See below. 40 CFR §60.332 Standard For Nitrogen Oxides. 40 CFR §60.332(a)(1) Standard For Nitrogen Oxides – 125 ppm (dry basis at 15% O2) In a November 15, 1995 letter (included in the permit renewal application) fuel bound nitrogen monitoring is not required for this facility. 40 CFR §60.333 Standard For Sulfur Dioxide. On and after the date on which the performance test required to be conducted by §60.8 is completed, every owner or operator subject to the provision of this subpart shall comply with one or the other of the following conditions: (b) No owner or operator subject to the provisions of this subpart shall burn in any stationary gas turbine any fuel which contains total sulfur in excess of 0.8 percent by weight (8000 ppmw). An alternative monitoring plan was approved by EPA on April 12, 1996 for sulfur monitoring on a quarterly basis at approved sampling sites along the pipeline. For a secondary method of compliance/monitoring of SO ₂ reference 40 CFR §60.334 Monitoring of Operations. (h) The owner or operator of any stationary gas turbine subject to the provisions of this subpart: (h)(3) Notwithstanding the provisions of paragraph (h)(1) of this section, the owner or operator may elect not to monitor the total sulfur content of the gaseous fuel combusted in the turbine, if	Regulation	Comments/Periodic Monitoring Requirements
Engines. MU-14 - This subpart will apply to MU-14 as a reconstructed engine. 40 CFR §60.4230 Am I Subject To This Subpart? (a)(5) Owners and operators of stationary SI ICE that commence modification or reconstruction after June 12, 2006. 40 CFR §60.4233 What Emission Standards Must I Meet If I Am An Owner Or Operator Of A Stationary SI Internal Combustion Engine? (e) Owners and operators of stationary SI ICE with a maximum engine power greater than or equal to		Subpart GG—Standards Of Performance For Stationary Gas Turbines: This subpart will apply to MU-15. See below. 40 CFR §60.332 Standard For Nitrogen Oxides. 40 CFR §60.332 (a)(1) Standard For Nitrogen Oxides. 40 CFR §60.332 (a)(1) Standard For Nitrogen Oxides. 40 CFR §60.333 Standard For Sulfur Dioxide. In a November 15, 1995 letter (included in the permit renewal application) fuel bound nitrogen monitoring is not required for this facility. 40 CFR §60.333 Standard For Sulfur Dioxide. On and after the date on which the performance test required to be conducted by §60.8 is completed, every owner or operator subject to the provision of this subpart shall comply with one or the other of the following conditions: (b) No owner or operator subject to the provisions of this subpart shall burn in any stationary gas turbine any fuel which contains total sulfur in excess of 0.8 percent by weight (8000 ppmw). An alternative monitoring plan was approved by EPA on April 12, 1996 for sulfur monitoring on a quarterly basis at approved sampling sites along the pipeline. For a secondary method of compliance/monitoring of SO ₂ reference 40 CFR §60.334 Monitoring of Operations. (h) The owner or operator of any stationary gas turbine subject to the provisions of this subpart (h)(3) Notwithstanding the provisions of paragraph (h)(1) of this section, the owner or operator may elect not to monitor the total sulfur content of the gaseous fuel combusted in the turbine, if the gaseous fuel is demonstrated to meet the definition of natural gas in §60.331(u), regardless of whether an existing customs schedule approved by the administrator for subpart Gorquires such monitoring. The owner or operator shall use one of the following sources of information to make the required demonstration: (h)(3)(1) The gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 sef or less. Subpart JJJJ:



Page 6 of 9

BAQ Engineering Services Division

Company Name:Transcontinental Gas Pipeline Company, LLCPermit Writer:Utpal B. PatelPermit Number:TV-2060-0179Date:DRAFT

Regulation	Comments/Periodic Monitoring Requirements
	the CO emission standards of Table 1 of this subpart.
	This exclusion for the CO Emission Standard would apply, as the facility is already subject to the CO emission limit under 40 CFR 63, Subpart ZZZZ.
	MU-1 through MU-13 and three Auxiliary Generators, AUX-1, AUX-2, and AUX-3 are not subject to this subpart because all the engines manufactured and installed prior to 2006. 40 CFR §60.4230
	(a)(4) Owners and operators of stationary SI ICE that commence construction after June 12, 2006, where the stationary SI ICE are manufactured:
	(a)(4)(i) On or after July 1, 2007, for engines with a maximum engine power greater than or equal to 500 HP (except lean burn engines with a maximum engine power greater than or equal to 500 HP and less than 1,350 HP);
	(a)(4)(ii) on or after January 1, 2008, for lean burn engines with a maximum engine power greater than or equal to 500 HP and less than 1,350 HP;
	(a)(4)(iii) on or after July 1, 2008, for engines with a maximum engine power less than 500 HP; or (a)(4)(iv) on or after January 1, 2009, for emergency engines with a maximum engine power greater than 19 KW (25 HP).
	(a)(5) Owners and operators of stationary SI ICE that commence modification or reconstruction after June 12, 2006.
	Subpart KbStandards Of Performance For Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) For Which Construction, Reconstruction, Or Modification Commenced After July 23, 1984
	40 CFR §60.110b, (a) Except as provided in paragraph (b) of this section, the affected facility to which this subpart applies is each storage vessel with a capacity greater than or equal to 75 cubic meters (m3) (19,813 gallons) that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984. The facility has not installed storage vessels > 75 cubic meters in size.
	Subpart KKKKStandards Of Performance For Stationary Combustion Turbines 40 CFR §60.4305, (a) If you are the owner or operator of a stationary combustion turbine with a heat input at peak load equal to or greater than 10.7 gigajoules (10 MMBtu) per hour, based on the higher heating value of the fuel, which commenced construction, modification, or reconstruction after February 18, 2005, your turbine is subject to this subpart. Subpart KKKK does not apply. MU-15 was installed in 1990.
	Subpart OOOO – Standards Of Performance For Crude Oil and Natural Gas Production, Transmission and Distribution
	This subpart applies to certain onshore affected facilities listed in paragraphs (a) through (g) of 40 CFR 60.5365 used in the oil and natural gas production, transmission and distribution constructed, modified or re-constructed after August 23, 2011. None of the sources at the facility have been modified or re-constructed; therefore, not subject to this subpart.
40 CFR 61 and 61-62.61	This facility does not contain any processes/operations that emit the pollutants subject to this standard (asbestos, benzene, beryllium, coke oven emissions, arsenic, mercury, radio nuclide, radon, or vinyl chloride).
40 CFR 63 and 61-62.63	40 CFR 63, Subpart ZZZZNational Emission Standards For Hazardous Air Pollutants For Stationary Reciprocating Internal Combustion Engines: This subpart will apply to MU-14 as a reconstructed engine



STATEMENT OF BASIS Page 7 of 9

BAQ Engineering Services Division

Company Name: Transcontinental Gas Pipeline Company, LLC Permit Writer: Utpal B. Patel Permit Number: TV-2060-0179 Date: DRAFT

Regulation	Comments/Periodic Monitoring Requirements
	40 CFR §63.6585 Am I Subject To This Subpart?
	You are subject to this subpart if you own or operate a stationary RICE at a major or area source of HAP emissions, except if the stationary RICE is being tested at a stationary RICE test cell/stand.
	(a) A stationary RICE is any internal combustion engine which uses reciprocating motion to convert heat energy into mechanical work and which is not mobile. Stationary RICE differ from mobile RICE in that a stationary RICE is not a non-road engine as defined at 40 CFR 1068.30, and is not used to propel a motor vehicle or a vehicle used solely for competition.
	(b) A major source of HAP emissions is a plant site that emits or has the potential to emit any single HAP at a rate of 10 tons (9.07 megagrams) or more per year or any combination of HAP at a rate of 25 tons (22.68 megagrams) or more per year, except that for oil and gas production facilities, a major source of HAP emissions is determined for each surface site.
	40 CFR §63.6595 When Do I Have To Comply With This Subpart?
	(a)(3) If you start up your new or reconstructed stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions after August 16, 2004, you must comply with the applicable emission limitations and operating limitations in this subpart upon startup of your affected source.
	40 CFR §63.6600 What Emission Limitations And Operating Limitations Must I Meet If I Own Or Operate A Stationary RICE With A Site Rating Of More Than 500 Brake HP Located At A Major Source Of HAP Emissions?
	(b) If you own or operate a new or reconstructed 2SLB stationary RICE with a site rating of more than 500 brake HP located at major source of HAP emissions, you must comply with the emission limitations in <u>Table 2a</u> to this subpart and the operating limitations in <u>Table 2b</u> to this subpart which apply to you.
	Engines MU-1 through MU-13 are subject to Subpart ZZZZ however there are no applicable requirements per 40 CFR 63.6600(c) because these units are existing 2 cycle lean burn engines.
	The emergency generators (IA-021 to IA-023) and emergency air compressor (IA-024) are subject to Subpart ZZZZ. The initial notification of applicability for these units was submitted on February 10, 2011 establishing them as existing stationary RICE engines.
	40 CFR 63.6600(c) - If you own or operate any of the following stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, you do not need to comply with the emission limitations in Tables 1a, 2a, 2c, and 2d to this subpart or operating limitations in Tables 1b and 2b to this subpart: an existing 2SLB stationary RICE; an existing 4SLB stationary RICE; a stationary RICE that combusts landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis; an emergency stationary RICE; or a limited use stationary RICE.
	Subpart YYYYNational Emission Standards for Hazardous Air Pollutants For Stationary Combustion Turbines at major source of HAP constructed after January 14, 2003.
	40 CFR §63.6090 (b)(4) Existing stationary combustion turbines in all subcategories do not have to meet the requirements of this subpart and of subpart A of this part. No initial notification is necessary for any existing stationary combustion turbine, even if a new or reconstructed turbine in



STATEMENT OF BASIS Page 8 of 9

BAQ Engineering Services Division

Company Name: Transcontinental Gas Pipeline Company, LLC
Permit Number: TV-2060-0179
Permit Writer: Utpal B. Patel
Date: DRAFT

Regulation	Comments/Periodic Monitoring Requirements
	the same category would require an initial notification. There are no applicable requirements for MU-15 under Subpart YYYY.
	Subpart HH – This subpart applies to dehydration units located at natural gas production facility at major or area source of HAP emissions. The facility is not a natural gas production facility nor does it operate dehydration units; therefore, not subject to this subpart.
	Subpart HHH – This subpart applies to glycol dehydration units at natural gas transmission and storage facilities that are major source of HAP emissions. The facility does not operate dehydration unit; therefore, not subject to this subpart.
	Subpart EEEE - This subpart applies to organic liquid distribution (OLD) (non-gasoline) operation at major source of HAP. This subpart does not apply because 40 CFR 63.2334(a) and (c)(2) specifically exclude natural gas transmission and storage facilities.
61-62.68	This facility does not store or use chemicals subject to 112(r) above the threshold quantities.
	MU-1 through MU-13 - These processes exceed PTE Title V threshold limits (>100 TPY for criteria pollutants), but the process does not have 'active' control equipment associated with it. The combustion modifications, HPFI TM , and TER technologies, installed as a part of Construction Permit CD are deemed to be intrinsic in nature and are not add on controls.
40 CFR 64	MU-14 - Per 40 CFR 64.2(b)(i), units that use an add-on control device that are subject to an NSPS or NESHAP rule proposed after November 15, 1990 are exempt from compliance assurance monitoring (CAM) requirements. Because the catalyst used on the converted engine is being installed to comply with NESHAP (Subpart ZZZZ) requirements proposed after that date, the proposed engine is not subject to the CAM rule. 40 CFR §64.2 Applicability.
	(b) Exemptions(1) Exempt emission limitations or standards. The requirements of this part shall not apply to any of the following emission limitations or standards:
	(b)(1)(i) Emission limitations or standards proposed by the Administrator after November 15, 1990 pursuant to section 111 or 112 of the Act.

AMBIENT AIR STANDARDS REVIEW

Regulation Comments/Periodic Monitoring Requirements	
	This facility has demonstrated compliance through modeling; see modeling summary dated August 19, 2015.
Standard No. 2	MU-1 through MU-13 - The following operational restriction has been established to ensure compliance with the modeled emission rates: These units are operated under the modified or controlled mode continuously not just during the Control Period.
Standard No. 7.c	This facility has demonstrated compliance through modeling for the PSD Class II increments; see modeling summary dated August 19, 2015.
Standard No. 8 (state only)	This standard does not apply to fuel burning sources which burn only virgin fuel. See modeling summary dated August 19, 2015.



STATEMENT OF BASIS Page 9 of 9

BAQ Engineering Services Division

Company Name:Transcontinental Gas Pipeline Company, LLCPermit Writer:Utpal B. PatelPermit Number:TV-2060-0179Date:DRAFT

PUBLIC NOTICE

This Title V Permit will undergo a 30-day public notice period and a 45-day EPA comment period in accordance with SC Regulation 61-62.1, Section II(N). This permit was placed in *The Herald-Journal* on December 11, 2015. The comment period was open from December 11, 2015 to January 9, 2016 and was placed on the BAQ website during that time period.

ADDITIONAL PUBLIC PARTICIPATION: No additional public participation required.

SUMMARY AND CONCLUSIONS

It has been determined that this source, if operated in accordance with the submitted application, will meet all applicable requirements and emission standards.